



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 5, 2020

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Application granted. The initial conference is hereby adjourned until October 2, 2020 at 2:30 pm.

SO ORDERED.

Hon. Ronnie Abrams
8/6/2020

Re: *Chen, et al. v. Barr, et al.*, No. 20 Civ. 5543 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which plaintiffs seek an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their Refugee/Asylee Relative Petition (Form I-730) and Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for August 21, 2020 be adjourned to a date at least one week after September 21, 2020.

By way of background, this Office was served with a copy of the complaint on July 22, 2020. Thus the government's response to the complaint is due September 21, 2020. *See* Fed. R. Civ. P. 12(a)(2). Additionally, USCIS has scheduled plaintiffs for an interview in regards to their Form I-730 and I-485 for August 13, 2020. The adjournment is respectfully requested in light of the September 21 response date and the upcoming interview, which will allow the government time to investigate the facts and circumstances of the case and formulate its position in this litigation. The government thus respectfully submits that the requested adjournment is in the interests of judicial efficiency and conservation of resources. This is the government's first request to adjourn the initial conference. Plaintiffs' counsel consents to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: s/ Simon Nakajima
SIMON NAKAJIMA
Special Assistant United States Attorney
Telephone: (212) 637-2770
Facsimile: (212) 637-2786
E-mail: simon.nakajima@usdoj.gov

cc: Counsel of record (via ECF)